

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

WARDA BENNOUR
704 Leyte Place
Oxon Hill, MD 20745

Plaintiff,

v.

Civil Action No. CA19-26352

WASHINGTON METROPOLITAN AREA
TRANSIT AUTHORITY
Please serve Resident Agent:
Robert Polk
Room 2-D
600 5th Street, NW
Washington, D.C. 20001

Defendant.

COMPLAINT

COMES NOW the Plaintiff, WARDA BENNOUR, by and through her attorneys
Sossiau, Kohler & Simcox, and William L. Kohler, Jr., Esquire, and sues the Defendants,
WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY, and for causes of action
states as follows:

2. That on or about the 13th day of June, 2018, the Plaintiff, WARDA BENNOUR
was a lawful passenger on a Washington Metropolitan Area Transit Authority Metro Bus, owned by the
Defendant, Washington Metropolitan Area Transit Authority, hereinafter referred to as "Metro".

3. At all times relevant hereto, the Defendant, Washington Metropolitan Area
Transit Authority is a corporate body which operates mass transit systems through out the Prince
George's suburban area.

4. That at that time and place, the bus was being operated by an agent of the
Defendant within the scope of his/her employment on Indian Head Highway at or near Southern Avenue
in Oxon Hill, Maryland in Prince George's County.

5. That the Defendant, Metro, is liable for the negligence of its agent through the
doctrine of respondeat superior.

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PRINCE GEORGE'S COUNTY
Clerk of the
Circuit Court

6. That the Defendant, Metro, and its agent driver, owed a duty to its passengers to operate the vehicle in a safe and prudent manner so as not to cause or create a hazard or unreasonable danger to the passengers.

7. That the Defendant, Metro, by and through its driver, breached said duty by failing to keep a proper lookout; by failing to devote full time and attention; by failing to keep his/her vehicle under control so as to avoid a collision; failing to stop in time to avoid a collision; by rear ending the bus in front; and, was otherwise negligent and careless.

8. That as a direct and proximate result of the negligence and carelessness of the Defendant, Metro, by and through its agent, Plaintiff sustained serious, painful and permanent injury in and about her head, neck, body and limbs, which rendered her sick, sore, lame and distressed. She has and will in the future suffer great physical pain and mental anguish; she has and will in the future be required to expend large sums of money for medical care, treatment and related items; she has and will in the future be unable to pursue her usual and normal activities; and, she was otherwise injured and damaged.

WHEREFORE, the Plaintiff, WARDA BENNOUR, demands judgment against the Defendant, Metro, in the sum of One Million Dollars (\$1,000,000.00), plus costs and interest.

JURY DEMAND

The Plaintiff demands a trial by jury as to all issues contained herein.

Respectfully submitted,
SOSSLAU, KOHLER & SIMCOX



William L. Kohler, Jr., Esquire
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